

## REMARKS

### I. Status of Claims

Claims 1-8 are pending in the present application. Claims 1 and 8 are independent. Claims 1-3, 5, and 8 are currently amended. Support for the additional language of these claims can at least be found on page 9, lines 14-25, page 10, lines 5-23, and page 11, lines 5-20. The Applicant believes that no new matter is added.

Claims 1, 2, 5, 6, and 8 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by EP 1297999 to Tanaka et al. (“Tanaka”).

Claims 3 and 4 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tanaka in view of USP 5,172,317 to Asanuma (“Asanuma”).

Claim 7 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Tanaka in view of EP 08724021 to Shimizu (“Shimizu”).

The Applicant respectfully requests reconsideration of these rejections in view of the foregoing amendments and the following remarks.

### II. Pending Claims

Independent claims 1 and 8 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Tanaka.

The Applicant respectfully submits that claim 1 is patentable over Tanaka at least because it recites, *inter alia*, “...wherein in estimating the vehicle position, a slowing operation with respect to a change in a moving distance of the vehicle is applied to a turning curvature that is estimated based on the steering angle value, and a compensation for a dynamic delay of the turning curvature due to a torsional deformation of a tire of the vehicle is performed.” (emphasis added)

The Applicant respectfully submits that claim 8 is patentable over Tanaka at least because it recites, *inter alia*, “...wherein in calculating the amount of the change in the direction of the vehicle, the change amount calculator applies a slowing operation with respect to a change in a moving distance of the vehicle to a turning curvature that is estimated based on the steering angle value, and performs a compensation for a dynamic delay of the turning curvature due to a

torsional deformation of a tire of the vehicle.” (emphasis added)

Certain embodiments of the present invention relate to a guiding device for guiding a vehicle to a target position by controlling a steering angle, while estimating the vehicle position at least based on a steering angle value provided. In estimating the vehicle position, the guiding device (i.e., a change amount calculator) applies a slowing operation (i.e., change in the moving distance) with respect to a change in a moving distance of the vehicle to a turning curvature that is estimated based on the steering angle value and performs a compensation for a dynamic delay of the turning curvature due to a torsional deformation of a tire of the vehicle.

In order to reject the independent claims, the Office Action cites Tanaka, which describes a steering actuator 1, a microcomputer 2, a CCD camera 3, a steering angle sensor 4, a display 5, a combination meter 6 (i.e., which paragraph [0026] indicates detects vehicle speed), and a shift position sensor 8. *See* paragraph [0011] of Tanaka.

In Tanaka, estimation of the vehicle is performed by directly using outputs of a steering angle sensor. That is, in Tanaka, outputs of a steering angle sensor are not subject to a slowing operation.

Also, the Applicant respectfully submits that Tanaka fails to disclose compensating for a dynamic delay of a turning curvature which is another recited feature of the inventions of claims 1 and 8.

Further, Tanaka fails to disclose any concept of a slowing operation for compensation of a dynamic delay due to torsional deformation of a tire or tires. In other words, the inventions of claims 1 and 8 address dynamic delays due to torsional deformation of a tire or tires that causes an error of estimation of the vehicle position. Tanaka simply does not address these dynamic delays.

In addition, as discussed in *KSR Int’l Co. v. Teleflex, et al.*, No. 04-1350, (U.S. Apr. 30, 2007), the Applicant respectfully submits that it remains necessary to identify the reason why a person of ordinary skill in the art would have been prompted to modify Tanaka in the manner as claimed by the Applicant. Obviousness cannot be sustained on mere conclusory statements.

Therefore, the Applicant respectfully submits that, for at least these reasons, claims 1 and 8, as well as their dependent claims, are patentable over Tanaka and the cited references.

### III. Conclusion

In light of the above discussion, the Applicant respectfully submits that the present application is in all aspects in allowable condition, and earnestly solicits favorable reconsideration and early issuance of a Notice of Allowance.

The Examiner is invited to contact the undersigned at (202) 220-4420 to discuss any matter concerning this application. The Office is authorized to charge any fees related to this communication to Deposit Account No. 11-0600.

Respectfully submitted,

Date: February 10, 2009

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